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11 Enterprises, Inc., DC Comics,  
12 and Sanrio, Inc.

13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA

15 Disney Enterprises, Inc., DC Comics and  
16 Sanrio, Inc.,

17 Plaintiffs,

18 v.

19 Jason Lancaster, an individual and d/b/a  
20 *www.partyanimalsoc.com*; The Party  
21 Animals, LLC; and Does 1 – 10,  
22 inclusive,

23 Defendants.

CV12-07347-DDP(JC)

COMPLAINT FOR COPYRIGHT  
INFRINGEMENT; TRADEMARK  
INFRINGEMENT; UNFAIR  
COMPETITION; TRADEMARK  
DILUTION; DECLARATORY  
RELIEF

DEMAND FOR A JURY TRIAL

24 Plaintiffs Disney Enterprises, Inc., DC Comics and Sanrio, Inc. (collectively  
25 “Plaintiffs”) for their Complaint allege as follows:

26 **ALLEGATIONS COMMON TO ALL CLAIMS FOR RELIEF**

27 **A. Introduction**

28 1. Plaintiffs filed this action to combat the willful sale or rental of  
unlicensed and counterfeit products bearing the Plaintiffs’ exclusive copyrights and  
trademarks. Defendants are the owners, operators, and managers of a retail business  
or related enterprise that is actively selling, offering for sale, renting, distributing, or  
manufacturing unlicensed and counterfeit costumes, which incorporate unauthorized

1 likenesses of the animated or live action characters or other logos owned by  
2 Plaintiffs, including, but not necessarily limited to, Mickey Mouse, Minnie Mouse,  
3 Pluto, Goofy, Winnie the Pooh, Tigger, various characters from the motion picture  
4 *Toy Story* and Handy Manny (from the television series *Handy Manny*), Batman,  
5 Robin, Superman, Wonder Woman, Super Girl, The Joker, Hello Kitty and Dear  
6 Daniel (collectively "Infringing Product").

7 2. Plaintiffs seek a permanent injunction, damages, costs, and attorneys'  
8 fees as authorized by the Copyright Act, Lanham Act and California's common law.

9 **B. Jurisdiction and Venue**

10 3. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §  
11 1338(a) as the Plaintiffs' cause of action arises under The Copyright Act, 17 U.S.C.  
12 § 101 and the Federal Trademark Act ("The Lanham Act of 1946"), 15 U.S.C. §  
13 1051 et seq. Further, this Court has jurisdiction over Plaintiff's California state  
14 statutory and common law claims pursuant to 28 U.S.C. § 1367.

15 4. Venue is proper within the Central District of California pursuant to 28  
16 U.S.C. §§ 1391(b) and 1400(a).

17 **C. Plaintiffs**

18 5. Plaintiff Disney Enterprises, Inc. ("DEI") is a corporation, duly  
19 organized and existing under the laws of the State of Delaware, having its principal  
20 place of business in Burbank, California.

21 a. DEI is a subsidiary of The Walt Disney Company ("Disney").

22 b. Disney, together with its subsidiaries, is a diversified worldwide  
23 entertainment company with operations in five business segments: Media Networks,  
24 Parks and Resorts, Studio Entertainment, Consumer Products and Interactive Media.  
25 Media Networks comprises international and domestic cable networks and its  
26 broadcasting business; Parks and Resorts comprises resorts and theme parks around  
27 the world, the Disney Cruise Line and licensed theme parks such as Tokyo Disney  
28 Resort in Japan; Studio Entertainment comprises live-action and animated theatrical

1 and video motion pictures, musical recordings and live stage plays; Consumer  
2 Products comprises relationships with licensees, manufacturers, publishers and  
3 retailers throughout the world to design, develop, publish, promote and sell a wide  
4 variety of products based on DEI's intellectual property as well as its own publishing  
5 and retail businesses; Interactive Media Group creates and delivers branded  
6 entertainment games and lifestyle content across interactive media platforms.

7 c. A significant aspect of Disney's business is the merchandising  
8 and licensing of distinctive elements associated with DEI's motion picture, television  
9 programs. The distinctive elements licensed and/or merchandised include, but are  
10 not limited to, the world-famous characters featured in numerous animated short  
11 films, video games, feature length motion pictures and television programs produced  
12 over a period of more than seventy years, including, but not limited to, Mickey  
13 Mouse, Minnie Mouse, Pluto, Goofy, Winnie the Pooh, Tigger, various characters  
14 from the motion picture *Toy Story* and Handy Manny (from the television series  
15 *Handy Manny*) (hereinafter referred to as the "DEI Characters").

16 d. The business associated with products sold in the United States  
17 which use the DEI Characters is substantial. The appearance and other features of  
18 the DEI Characters are inherently distinctive and serve to identify DEI and its  
19 licensees as the source of products bearing the DEI Characters. The design,  
20 configuration and distinctive features of the DEI Characters and other DEI  
21 copyrighted works, and of works related thereto (hereinafter individually and  
22 collectively referred to as "DEI's Copyrighted Designs"), are wholly original with  
23 DEI and, as fixed in various tangible media, including merchandise, are  
24 copyrightable subject matter under the United States Copyright Act, 17 U.S.C.,  
25 Sections 101, *et seq.* DEI is the owner of DEI's Copyrighted Designs and, as  
26 featured on in connection with various merchandise, constitute copyrightable subject  
27 matter under the Copyright Act of 1976, 17 U.S.C. § 101, *et seq.*  
28

1 e. DEI, and its predecessors in interest, including Walter E. Disney,  
2 have complied in all respects with the laws governing copyright and have secured the  
3 exclusive rights and privileges in and to the copyrights to DEI's Copyrighted  
4 Designs, and DEI owns one or more certificates of registration for works in which  
5 each of DEI's Copyrighted Designs appear. A representative list of copyright  
6 registrations for DEI's Copyrighted Designs is attached hereto as Exhibit A.

7 f. Products featuring DEI's Copyrighted Designs which are  
8 manufactured, sold and distributed by DEI or under its authority have been  
9 manufactured, sold and distributed in conformity with the provisions of the copyright  
10 laws. DEI and those acting under its authority have complied with their obligations  
11 under the copyright laws, and DEI, in its own right or as successor-in-interest, has at  
12 all times been and still is the sole proprietor or otherwise authorized to enforce all  
13 right, title and interest in and to the copyrights in each of DEI's Copyrighted  
14 Designs.

15 g. DEI is the owner of world famous registered marks which serve  
16 to distinguish DEI products ("DEI's Trademarks"). Some of those trademarks have  
17 been used continuously for over seventy years. Each year DEI spends substantial  
18 amounts to develop and maintain the considerable goodwill it enjoys in its  
19 trademarks and in its reputation for high quality. A representative list of trademark  
20 registrations for DEI's Trademarks is attached hereto as Exhibit B.

21 h. DEI's Trademarks are all valid, extant and in full force and effect.  
22 DEI's Trademarks are all exclusively owned by DEI. DEI has continuously used  
23 each of DEI's Trademarks from the registration date, or earlier, until the present and  
24 at all times relevant to the claims alleged in this Complaint.

25 i. As a result of advertising and sales, together with longstanding  
26 consumer acceptance, DEI's Trademarks identify DEI's products and authorized  
27 sales of these products. DEI's Trademarks have each acquired secondary meaning in  
28 the minds of consumers throughout the United States and the world. DEI's

1 Characters, Copyrighted Designs and Trademarks are collectively referred to herein  
2 as DEI's Properties.

3 6. DC Comics is a New York General Partnership consisting of E.C.  
4 Publications, Inc. and Warner Communications Inc., having its principal place of  
5 business in New York, New York.

6 a. DC is engaged in the business of publishing comic magazines and  
7 is among the most well-known and successful publishers of comic magazines in the  
8 world. It has created and published highly successful and well-known characters  
9 including but not limited to BATMAN, ROBIN, THE JOKER, SUPERMAN,  
10 SUPER GIRL and WONDER WOMAN (hereinafter individually and collectively  
11 referred to as the "DC Characters").

12 b. A significant aspect of DC Comics' business is the merchandising  
13 and licensing of distinctive trademarks and copyrights associated with its highly  
14 successful and well-known DC Characters. Of these, two of the most successful  
15 characters have been Batman and Superman.

16 c. Batman first appeared in the May 1939 issue of "Detective  
17 Comics." Numerous related characters, including "Robin," "The Riddler," "Two  
18 Face," "Catwoman," "The Penguin" and "The Joker" as well as other popular  
19 characters associated with Batman were soon introduced to the public. (Batman and  
20 the related characters are hereinafter collectively referred to as the "Batman  
21 Characters").

22 d. Superman appeared at least as early as 1938. Numerous related  
23 characters, including "Clark Kent," "Lois Lane," and "Lex Luthor" as well as other  
24 popular characters associated with Superman were soon introduced to the public.  
25 (Superman and the related characters are hereinafter collectively referred to as the  
26 "Superman Characters").

27 e. Since their introductions, the Batman Characters and Superman  
28 Characters have been featured in many formats, other than comic books, including



1 movie serials, newspaper comic strips, radio shows, animated television series, live  
2 action television series, animated motion pictures, live action motion picture and  
3 theatrical presentations, among others. Television series featuring the Batman  
4 Characters and the Superman Characters have since been in continuous television  
5 syndication in the United States and abroad for many decades. These appearances  
6 have expanded the popularity of the Batman Characters and the Superman  
7 Characters beyond the comic book medium and market.

8 f. The Batman Characters have also been featured in the 1989  
9 motion picture entitled *BATMAN* (the "1989 Film"), the 1992 motion picture entitled  
10 *BATMAN RETURNS* (the "1992 Film"), the 1995 motion picture entitled *BATMAN*  
11 *FOREVER* (the "1995 Film"), the 1997 motion picture entitled *BATMAN & ROBIN*  
12 (the "1997 Film"), the 2005 motion picture entitled *BATMAN BEGINS* (the "2005  
13 Film"), the 2008 motion picture entitled *THE DARK KNIGHT* (the "2008 Film") and  
14 the most recent motion picture entitled *THE DARK KNIGHT RISES* ("2012 Film").

15 g. The 1989 Film generated over \$251 million dollars in domestic  
16 box office receipts. The 1992 Film generated over \$162 million dollars in domestic  
17 box office receipts. The 1995 Film generated over \$184 million dollars in domestic  
18 box office receipts. The 1997 Film generated over \$107 million dollars in domestic  
19 box office receipts. The 2005 Film generated over \$205 million dollars in domestic  
20 box office receipts. And the 2008 Film generated over \$533 million dollars in  
21 domestic box office receipts. The *BATMAN* motion pictures have resulted in  
22 domestic gross box office receipts in over a billion dollars, not to mention additional  
23 revenues from syndication rights and home video distribution. The *BATMAN* motion  
24 pictures have proven to be among the most successful licensing and merchandising  
25 ventures of all time, with gross retail sales of associated licensed merchandise  
26 exceeding \$1,000,000,000.

27 h. The Superman Characters have also appeared in numerous  
28 theatrical motion pictures since their introduction. The most recent motion picture

1 featuring the Superman Characters, *SUPERMAN RETURNS*, was released on June  
2 28, 2006, and has generated more than \$200 million dollars in domestic box office  
3 receipts and more than \$190 million dollars in international box office receipts. The  
4 Superman Characters have also been featured in numerous other theatrical motion  
5 pictures, including a series of four motion pictures starring Christopher Reeve. Such  
6 motion pictures include *SUPERMAN THE MOVIE*, *SUPERMAN II*, *SUPERMAN III*  
7 and *SUPERMAN IV: THE QUEST FOR PEACE*, all of which collectively generated  
8 over \$750 million dollars in worldwide box office receipts.

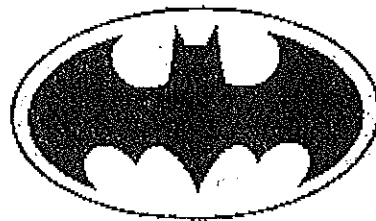
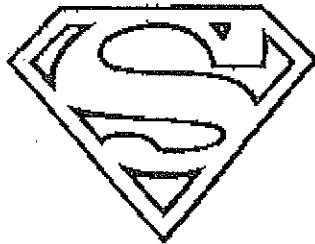
9 i. Revenues generated from products and services using the DC  
10 Characters sold in the United States are substantial. The appearance and other  
11 features of the DC Characters are inherently distinctive and serve to identify DC  
12 Comics and its licensees as the source of products bearing the DC Characters. The  
13 design, configuration and distinctive features of the DC Characters and other DC  
14 Comics' copyrighted works, and of works related thereto (hereinafter individually  
15 and collectively referred to as the "DC Comics' Copyrighted Designs"), are wholly  
16 original with DC Comics and, as fixed in various tangible media, including, without  
17 limitation, costumes and related merchandise, are copyrightable subject matter under  
18 the United States Copyright Act, 17 U.S.C., §§ 101, et seq. DC Comics is the owner  
19 of DC Comics' Copyrighted Designs and, as featured on in connection with various  
20 merchandise, these designs constitute copyrightable subject matter under the  
21 Copyright Act of 1976, 17 U.S.C. §§ 101, et seq.

22 j. DC Comics has complied in all respects with the laws governing  
23 copyright and has secured the exclusive rights and privileges in and to the copyrights  
24 to the DC Comics' Copyrighted Designs, and DC Comics owns one or more  
25 certificates of registration for works in which each of the DC Comics' Copyrighted  
26 Designs appear. A representative list of copyright registrations for the DC Comics'  
27 Copyrighted Designs is attached as Exhibit "C."  
28

1           k.     Products featuring the DC Comics' Copyrighted Designs  
2 manufactured, sold and distributed by DC Comics or under its authority have been  
3 manufactured, sold and distributed in conformity with the provisions of the copyright  
4 laws. DC Comics and those acting under its authority have complied with their  
5 obligations under the copyright laws and DC Comics has at all times been and still is  
6 the sole proprietor or otherwise authorized to enforce all right, title and interest in  
7 and to the copyrights in each of the DC Comics' Copyrighted Designs.

8           l.     DC Comics owns all right, title and interest in and to and holds  
9 exclusive right to develop, manufacture, market and sell product bearing the  
10 trademarks, trade names, service marks, artwork, characters and other distinctive  
11 elements for and incorporating the DC Characters.

12           m.    DC Comics is the owner of world famous registered marks which  
13 serve to distinguish DC products (hereinafter individually and collectively referred to  
14 as the "DC Comics Trademarks"). Each year DC Comics spends millions of dollars  
15 to develop and maintain the considerable good will it enjoys in its trademarks and in  
16 its reputation for high quality. A representative list of trademark registrations for the  
17 DC Comics Trademarks is attached as Exhibit "D," including, but not limited to, the  
18 trademark registration of the Superman "S in Shield Logo" and the Batman "Bat  
19 Emblem" devices are depicted below:



25           n.    The DC Comics Trademarks are all valid, extant and in full force  
26 and effect. The DC Comics Trademarks are all exclusively owned by DC Comics.  
27 DC Comics has continuously used each of the DC Comics Trademarks from the  
28



1 registration date, or earlier, until the present and at all times relevant to the claims  
2 alleged in this Complaint.

3 o. DC has granted and transferred to its related companies, Warner  
4 Bros. Consumer Products Inc., and WB Studio Enterprises Inc., subsidiaries of  
5 Warner Bros. Entertainment Inc., the right to supervise in the United States the  
6 merchandising and licensing of the copyrighted elements, trademarks, trade names  
7 and service marks incorporated in or associated with the DC Characters. Currently,  
8 Plaintiffs have numerous active license agreements in the United States. These  
9 agreements provide for the authorized use of the DC Characters on products and in  
10 connection with services, including costumes and related merchandise.

11 p. As a result of advertising and sales, together with longstanding  
12 consumer acceptance, the DC Comics Trademarks identify DC Comics' products  
13 and authorized sales of these products. The DC Comics Trademarks have each  
14 acquired secondary meaning in the minds of consumers throughout the United States  
15 and the world. DC Comics' Copyrighted Designs and the DC Comics Trademarks  
16 are collectively referred to herein as "DC Comics' Properties."

17 7. Plaintiff Sanrio, Inc. ("Sanrio") is a corporation, duly organized and  
18 existing under the laws of the State of California, having its principal place of  
19 business in South San Francisco, California. Sanrio is a wholly owned subsidiary of  
20 Sanrio Company, Ltd. Sanrio Company, Ltd. is a corporation organized under the  
21 laws of Japan, having its principal place of business in Tokyo, Japan (hereinafter  
22 referred to as "Sanrio Company").

23 a. For more than fifty years, Sanrio Company has been engaged in  
24 the business of manufacturing, distributing and selling a wide range of products  
25 including, without limitation, character artwork created, developed and designed by  
26 Sanrio Company for use by children and young adults. Certain of the characters and  
27 designs have achieved such global fame and popularity that Sanrio Company has  
28 produced and distributed television programming for children based on the character

1 artwork. One such television program is the animated television series entitled *Hello*  
2 *Kitty*.

3 b. A significant source of revenue for Sanrio Company is the  
4 merchandising and licensing of distinctive elements bearing character artwork,  
5 including, but not limited to, Hello Kitty, Hangyodon, Chococat, Osaru No  
6 Monkichi, Bad Badtz-Maru, KeroKeroKeroppi, My Melody, Dear Daniel  
7 (hereinafter individually and collectively referred to as the "Sanrio Company  
8 Characters").

9 c. The revenue from products using the Sanrio Company Characters  
10 sold in the United States is substantial. The appearance and other features of the  
11 Sanrio Company Characters are inherently distinctive and serve to identify Sanrio  
12 Company as the source of products bearing the Sanrio Company Characters. The  
13 design, configuration and distinctive features of the Sanrio Company Characters and  
14 other Sanrio Company copyrighted works, and of works related thereto (hereinafter  
15 individually and collectively referred to as "Sanrio Company's Copyrighted  
16 Designs") are wholly original with Sanrio Company and, as fixed in various tangible  
17 media including, without limitation, merchandise, are copyrightable subject matter  
18 under the United States Copyright Act, 17 U.S.C., § 101, *et seq.* Sanrio Company is  
19 the owner of Sanrio Company's Copyrighted Designs and, as featured on and in  
20 connection with various merchandise, these designs constitute copyrightable subject  
21 matter under the Copyright Act of 1976, 17 U.S.C. § 101, *et seq.*

22 d. Sanrio Company has complied in all respects with the laws  
23 governing copyright and has secured the exclusive rights and privileges in and to the  
24 copyrights to Sanrio Company's Copyrighted Designs, and Sanrio Company owns  
25 one or more certificates of registration for works in which each of Sanrio Company's  
26 Copyrighted Designs appear. A representative list of copyright registrations for  
27 Sanrio Company's Copyrighted Designs is attached hereto as Exhibit "E." Sanrio  
28 Company's Copyrighted Designs manufactured, sold, and distributed by Sanrio

1 Company or under its authority have been manufactured, sold, and distributed in  
2 conformity with the provisions of the copyright laws. Sanrio Company and those  
3 acting under its authority have complied with their obligations under the copyright  
4 laws. Sanrio, as the exclusive United States licensee for Sanrio Company, is  
5 authorized to enforce all right, title, and interest in and to the copyrights in each of  
6 Sanrio Company's Copyrighted Designs.

7 e. Sanrio Company owns all right, title, and interest in and to and  
8 holds exclusive rights to develop, manufacture, market, and sell products bearing the  
9 trademarks, trade names, service marks, artwork, characters, and other distinctive  
10 elements for and incorporating the Sanrio Company Characters.

11 f. Sanrio Company is the owner of world famous registered marks,  
12 which serve to distinguish Sanrio Company products (hereinafter individually and  
13 collectively referred to as the "Sanrio Company Trademarks"). Some of those  
14 trademarks have been used continuously for more than twenty-five years. Each year  
15 Sanrio Company spends millions of dollars to develop and maintain the considerable  
16 good will it enjoys in its trademarks and in its reputation for high quality. A  
17 representative list of trademark registrations for the Sanrio Company Trademarks is  
18 attached hereto as Exhibit "F."

19 g. The Sanrio Company Trademarks are all valid; extant, and in full  
20 force and effect. Sanrio Company's Trademarks are exclusively owned by Sanrio  
21 Company. Sanrio Company has continuously used each of the Sanrio Company  
22 Trademarks from the registration date, or earlier, until the present and at all times  
23 relevant to the claims alleged in this Complaint.

24 h. As a result of advertising and sales, together with longstanding  
25 consumer acceptance, the Sanrio Company Trademarks identify Sanrio Company's  
26 products and authorized sales of these products. The Sanrio Company Trademarks  
27 have each acquired secondary meaning in the minds of consumers throughout the  
28 United States and the world. Sanrio, as the exclusive U.S. licensee for Sanrio

1 Company, is authorized to enforce all right, title, and interest in and to the  
2 trademarks in each of the Sanrio Company Trademarks.

3 i. Through Sanrio, Sanrio Company has authorized and licensed the  
4 manufacture and sale of various different types of product, which bear the Sanrio  
5 Copyrighted Designs and Trademarks, including, but not limited to costumes and  
6 related merchandise.

7 9. The DEI Characters, DC Characters, and Sanrio Company Characters  
8 are collectively referred to herein as "Plaintiffs' Characters." DEI's Copyrighted  
9 Designs, DC Comics' Copyrighted Designs, and the Sanrio Company Copyrighted  
10 Designs are collectively referred to herein as "Plaintiffs' Copyrighted Designs."  
11 The DEI Trademarks, DC Comics Trademarks, s and Sanrio Company Trademarks  
12 are collectively referred to herein as "Plaintiffs' Trademarks." Plaintiffs'  
13 Copyrighted Designs and Plaintiffs' Trademarks are collectively referred to herein as  
14 "Plaintiffs' Properties."

15 **D. Defendants**

16 10. Defendant Jason Lancaster is an individual and d/b/a  
17 www.partyanimalsoc.com ("Lancaster") and is a resident of the County of Orange  
18 and the State of California. Plaintiffs are informed and believe, and upon that basis  
19 allege, that Lancaster does business through the website, including but not limited to,  
20 www.partyanimalsoc.com. Plaintiffs are further informed and believe, and based  
21 thereon allege, that Lancaster had the right and ability to supervise or control the  
22 infringing activity alleged herein and that Lancaster had a direct financial interest in  
23 such activity. In addition or alternatively, Lancaster had knowledge or reason to  
24 know of the infringing activity and took actions which contributed to such activity.

25 11. Defendant The Party Animals, LLC ("TPA") is a California  
26 Corporation, with its principal place of business in the city of Marina Del Rey,  
27 California. Plaintiffs are informed and believe that TPA does business through the  
28 website located at the domain name www.partyanimalsoc.com. TPA is subject to the

1 jurisdiction of this Court and is manufacturing, promoting, distributing, advertising  
2 and selling unlicensed and counterfeit costumes and related merchandise which  
3 infringe Plaintiffs' intellectual properties within this judicial district.

4 12. Upon information and belief, Does 1 – 10 are either entities or  
5 individuals who are residents of or present in this judicial district, and are subject to  
6 the jurisdiction of this Court. Upon information and belief, Does 1 – 10 are  
7 principals or supervisory employees of the named defendants, suppliers of the named  
8 defendants or other entities or individuals who are manufacturing, distributing,  
9 selling and/or offering for sale character costumes and related merchandise in this  
10 judicial district which infringes some or all of Plaintiffs' intellectual properties. The  
11 identities of the various Does are unknown to Plaintiffs at this time. The Complaint  
12 will be amended to include the names of such individuals when identified. The  
13 named defendants and Does 1 – 10 are collectively referred to herein as  
14 "Defendants."

### 15 **COUNT I - COPYRIGHT INFRINGEMENT**

16 13. Plaintiffs bring the following claim of copyright infringement against  
17 the Defendants and incorporate by reference allegations 1 through 12 above.

18 14. Defendants have manufactured, distributed, sold, offered for sale, or  
19 rented unauthorized or counterfeit character costumes and related merchandise  
20 bearing the copyrighted properties of the Plaintiffs. Itemized lists of some, but not  
21 all, of said copyrighted properties infringed upon appear in Exhibits "A," "C," and  
22 "E".

23 15. Defendants have never been authorized by the Plaintiffs to distribute the  
24 Plaintiffs' copyrighted properties, nor have the Plaintiffs ever authorized, licensed, or  
25 in any manner allowed the Defendants the right to manufacture, distribute, sell, offer  
26 for sale, or rent any merchandise including, but not limited to, character costumes or  
27 related merchandise which bear any of said copyrighted properties.  
28



1           16. Defendants have manufactured, distributed, sold, offered for sale, or  
2 rented unauthorized or counterfeit character costumes and related merchandise which  
3 incorporate the Plaintiffs' copyrighted properties, in direct violation of the Plaintiffs'  
4 copyrights.

5           17. Defendants have manufactured, distributed, sold, offered for sale, or  
6 rented counterfeit or unauthorized character costumes or other merchandise bearing  
7 the Plaintiffs' copyrighted properties. Defendants committed their acts with actual  
8 as well as constructive knowledge of the Plaintiffs' exclusive rights, and their actions  
9 have contributed to the infringing, copying, duplication, sale, offer for sale, or rental  
10 of counterfeit copies of the Plaintiffs' copyrighted properties. Each act by the  
11 Defendants that infringes one of the Plaintiffs' copyrights is the basis for a separate  
12 claim against the Defendants under the Copyright Act.

13           18. Upon information and belief, Defendants' acts as alleged are willful  
14 infringements of and have irreparably harmed the Plaintiffs' copyrights and  
15 exclusive rights and threaten further infringements and further irreparable harm to  
16 Plaintiffs' copyrights and exclusive rights. Further harm and injury to Plaintiffs is  
17 imminent, and the Plaintiffs are without an adequate remedy at law with respect to  
18 such harm and injury. Unless Defendants' acts are enjoined and the illicit  
19 counterfeiters of the Plaintiffs' copyrighted properties are stopped, it is highly  
20 probable that the Defendants, or others under Defendants' direction, will  
21 manufacture, distribute, sell, offer for sale, or rent additional counterfeit character  
22 costumes or other merchandise which bear the Plaintiffs' copyrighted properties  
23 causing further irreparable injury to Plaintiffs.

24           19. Defendants have obtained gains, profit, and advantages as a result of  
25 their wrongful acts noted above.

26           20. The Plaintiffs are entitled, at their option, to statutory damages as  
27 provided by 17.U.S.C. § 504 in lieu of actual damages and the Defendants' profits.  
28

**COUNT II - TRADEMARK INFRINGEMENT AND TRADEMARK  
COUNTERFEITING**

21. Plaintiffs bring the following claim of trademark infringement against the Defendants and incorporate by reference paragraphs 1 through 20 above.

22. Plaintiffs own or are licensees of the exclusive rights to those trademarks indexed on Exhibits "B," "D," and "F". All of the trademark registrations are in full force and effect and are owned by the Plaintiffs or Plaintiffs' licensors. Many of the trademarks are incontestable pursuant to 15 U.S.C. § 1065.

23. Plaintiffs, or those under their authority, manufacture and distribute all of their advertising and products in conformity with the provisions of the United States trademark law.

24. Notwithstanding the Plaintiffs' or their licensors' well-known and prior common law and statutory rights in the trademarks, Defendants have, with actual and constructive notice of the Plaintiffs' federal registration rights and long after the Plaintiffs' established their rights, adopted and used the trademarks in conjunction with the sale of character costumes and related merchandise in the State of California and interstate commerce.

25. Defendants have distributed, sold, offered for sale, or rented character costumes and related merchandise bearing Plaintiffs' trademarks without Plaintiffs' authorization. Defendants' distribution, sale, offer for sale, or rental of character costumes and related merchandise bearing Plaintiffs' trademarks in California and interstate commerce has and will cause the likelihood of confusion, deception, and mistake in that the buying public will conclude that the products sold by the Defendants are authorized, sponsored, approved, or associated with the Plaintiffs.

26. Said acts of infringement will cause irreparable injury to the Plaintiffs if the Defendants are not restrained by the Court from further violation of the Plaintiffs' rights as the Plaintiffs have no adequate remedy at law.

27. The Plaintiffs have suffered damages as a result of the Defendants' acts.

28. Defendants' use in commerce of Plaintiffs' trademarks in conjunction with the sale of character costumes and related merchandise is an infringement of Plaintiffs' registered trademarks in violation of 15 U.S.C. § 1114(1).

29. Defendants committed the acts alleged herein intentionally, fraudulently, maliciously, willfully, wantonly, and oppressively with the intent to injure the Plaintiffs and their businesses.

30. The unlicensed character costumes bearing the Plaintiffs' trademarks that the Defendants' sold, distributed, offered for sale, or rented constitutes a counterfeit product pursuant to 15 U.S.C. § 1116(d).

### **COUNT III - UNFAIR COMPETITION UNDER THE LANHAM ACT**

31. Plaintiffs bring the following claim of unfair competition against Defendants and incorporate by reference the allegations set forth in paragraphs 1 through 30 above.

32. As a direct result of the Plaintiffs' longstanding use, sales, advertising, and marketing, Plaintiffs' trademarks have acquired a secondary and distinctive meaning among the public who have come to identify Plaintiffs' trademarks listed on Exhibits "B," "D," and "F" with the Plaintiffs and their respective products.

33. The unauthorized and counterfeit character costumes and related merchandise that the Defendants have sold and distributed exactly duplicates and appropriated Plaintiffs' trademarks and deludes and confuses the public into believing that the Plaintiffs approved, authorized, or sponsored the character costumes and related merchandise sold, offered for sale, rented, or distributed by the Defendants.

34. Defendants, by misappropriating and using the likenesses of Plaintiffs' trademarks in connection with the sale or rental of character costumes and related merchandise, is misrepresenting and will continue to misrepresent and falsely describe to the general public the origin and sponsorship of their products and/or services. Defendants have caused such products to enter into interstate commerce

1 willfully with full knowledge of the falsity of the designation of their origin and  
2 description and representation in an effort to mislead the purchasing public into  
3 believing that their products are authorized or emanate from the Plaintiffs.

4 35. These acts constitute a violation of Section 43 of the Lanham Act, 15  
5 U.S.C. § 1125.

6 36. The Defendants have obtained gains, profits, and advantages as a result  
7 of their unlawful acts.

8 37. The Plaintiffs have suffered monetary damages as a result of the  
9 Defendants' acts.

10 **COUNT IV - UNFAIR COMPETITION UNDER CALIFORNIA'S COMMON**  
11 **LAW**

12 38. Plaintiffs bring the following claim of unfair competition against  
13 Defendants and incorporate by reference the allegations set forth in paragraphs 1  
14 through 37 above.

15 39. Plaintiffs have expended significant sums of money in advertising and  
16 marketing products featuring its products and in creating a consumer demand for  
17 such products in California and elsewhere in the United States. Consequently, these  
18 products have become widely known and accepted.

19 40. Defendants have distributed, rented and/or sold unauthorized and  
20 counterfeit character costumes and related merchandise bearing exact copies of  
21 Plaintiffs' trademarks in California, thereby passing them off as products authorized  
22 or distributed by the Plaintiffs.

23 41. Defendants have knowingly and willfully appropriated Plaintiffs'  
24 trademarks in an effort to create the impression that the Defendants' counterfeit  
25 products are sanctioned by the Plaintiffs and to misappropriate all of the goodwill  
26 associated with Plaintiffs' trademarks.

27 42. The Defendants' acts constitute unfair competition and will, unless  
28 enjoined by this Court, result in the destruction or dilution of the goodwill in

1 Plaintiffs' trademarks and of Plaintiffs' valuable trademark rights to the unjust  
2 enrichment of the Defendants.

3 43. The unauthorized products that are sold by the Defendants are  
4 calculated and likely to deceive and mislead the purchasers who buy them in the  
5 belief that they originate with or are authorized by the Plaintiffs.

6 44. The continued passing off by the Defendants of such unauthorized  
7 products as if such products originated from the Plaintiffs has caused and, unless  
8 restrained, will continue to cause serious and irreparable injury to the Plaintiffs.

9 45. The Plaintiffs have no adequate remedy at law and suffers irreparable  
10 harm as a result of the Defendants' acts.

11 46. The Plaintiffs have suffered damages as a result of the Defendants' acts.

12 47. Defendants committed the alleged acts intentionally, fraudulently,  
13 maliciously, willfully, wantonly, and oppressively with the intent to injure the  
14 Plaintiffs' and their businesses.

15 **PRAYER FOR RELIEF**

16 WHEREFORE, Plaintiffs demand entry of a judgment against the defendant  
17 as follows:

18 1. Permanent injunctive relief restraining the Defendants, their officers,  
19 agents, servants, employees, attorneys, and all those in active concert or participation  
20 with them from:

21 a. Further infringing Plaintiffs' copyrighted properties, trademarks,  
22 and licensed trademarks by manufacturing, producing, distributing, circulating,  
23 selling, marketing, offering for sale, renting, advertising, promoting, displaying, or  
24 otherwise disposing of any products not authorized by the Plaintiffs including, but  
25 not limited to, character costumes and related merchandise bearing any simulation,  
26 reproduction, counterfeit, copy, or colorable imitation of any of Plaintiffs'  
27 trademarks ("Unauthorized Products");  
28



1           b. Using any simulation, reproduction, counterfeit, copy, or  
2 colorable imitation of any of Plaintiffs' copyrighted properties, trademarks, and  
3 licensed trademarks in the promotion, advertisement, display, sale, offer for sale,  
4 rental, manufacture, production, circulation, or distribution of Unauthorized Products  
5 in such fashion as to relate or connect, or tend to relate or connect, such products in  
6 any way to the Plaintiffs or to any goods sold, manufactured, sponsored, or approved  
7 by or connected with the Plaintiffs;

8           c. Making any statement or representation whatsoever, or using any  
9 false designation of origin or false description, or performing any act that can or is  
10 likely to lead the trade or public, or individual members thereof, to believe that any  
11 products manufactured, distributed, or sold by the Defendants is in any manner  
12 associated or connected with the Plaintiffs, or are sold, manufactured, licensed,  
13 sponsored, approved, or authorized by the Plaintiffs;

14           d. Engaging in any other activity constituting unfair competition  
15 with any of the Plaintiffs, or constituting an infringement of any of Plaintiffs'  
16 trademarks or of Plaintiffs' rights in, or to use or to exploit said trademarks, or  
17 constituting any dilution of any of the Plaintiffs' names, reputations, or goodwill;

18           e. Effecting assignments or transfers, forming new entities or  
19 associations or using any other device for the purpose of circumventing or otherwise  
20 avoiding the prohibitions set forth in Subparagraphs a. through d.;

21           f. Secreting, destroying, altering, removing, or otherwise dealing  
22 with the Unauthorized Products or any books or records that may contain any  
23 information relating to the importing, manufacturing, producing, distributing,  
24 circulating, selling, marketing, offering for sale, renting, advertising, promoting, or  
25 displaying of all unauthorized products that infringe any of the Plaintiffs' trademarks  
26 or copyrights; and

27           g. From aiding, abetting, contributing to, or otherwise assisting  
28 anyone from infringing upon any of the Plaintiffs' trademarks or copyrights.

1           2. Directing that the Defendants deliver for destruction all Unauthorized  
2 Products including character costumes, labels, signs, prints, packages, dyes,  
3 wrappers, receptacles, and advertisements in their possession or under their control  
4 bearing any of Plaintiffs' trademarks or any simulation, reproduction, counterfeit,  
5 copy, or colorable imitation thereof, and all plates, molds, heat transfers, screens,  
6 matrices, and other means of making the same.

7           3. In order to give practical meaning effect to any preliminary and  
8 permanent injunctions, the domain name(s) be ordered immediately transferred by  
9 the Defendants, the Registry and the Registrars to Plaintiffs' control.

10          4. Directing that the Defendants report to this Court within thirty (30) days  
11 after a Permanent Injunction is entered to show its compliance with paragraphs 1 and  
12 2 above.

13          5. Directing such other relief as the Court may deem appropriate to  
14 prevent the trade and public from gaining the erroneous impression that the Plaintiffs  
15 authorized or are related in any way to any products manufactured, sold, rented, or  
16 otherwise circulated or promoted by the Defendants.

17          6. Awarding to the Plaintiffs from the Defendants, as a result of the  
18 Defendants' sale of Unauthorized Products bearing the Plaintiffs' trademarks, three  
19 times the Plaintiffs' damages and three times the Defendants' profits, after an  
20 accounting, or statutory damages, should the Plaintiffs opt for such relief, consisting  
21 of \$200,000.00 for each of the Plaintiffs' trademarks infringed upon by the  
22 Defendants, and to the extent this Court concludes such infringement was willful,  
23 \$2,000,000.00 for the Plaintiffs' trademarks infringed upon by the Defendants  
24 pursuant to 15 U.S.C. § 1114 and § 1117.

25          7. Awarding to each Plaintiff from the Defendants selling Unauthorized  
26 Products three times its damages therefrom and three times Defendants' profits  
27 therefrom, after an accounting, pursuant to 15 U.S.C. § 1125(a) and § 1117.  
28

1           8. That Plaintiffs be awarded from each Defendant found to be in violation  
2 of their copyrighted properties, the Defendants' profits, or at Plaintiffs' election, an  
3 award of statutory damages pursuant to 15 U.S.C. § 504, of no less than Seven  
4 Hundred Fifty Dollars (\$750) nor more than Thirty Thousand Dollars (\$30,000) per  
5 copyrighted property infringed upon by each Defendant, at the Court's discretion, or  
6 should this Court find that such infringement was willful, that this Court, pursuant to  
7 its discretion, award statutory damages of up to One Hundred Fifty Thousand Dollars  
8 (\$150,000) for each copyrighted property infringed upon by each such Defendant.

9           9. Awarding to the Plaintiffs its reasonable attorneys' fees and  
10 investigative fees pursuant to 15 U.S.C. § 1117.

11           10. Awarding to the Plaintiffs their costs in bringing this action.

12           11. Awarding punitive damages to the Plaintiffs for the Defendants' willful  
13 acts of unfair competition under California's common law.

14           12. Awarding other such relief to the Plaintiffs as this Court deems just.

15  
16 Dated: August 24, 2012

J. Andrew Coombs, A Professional Corp.

17 By:   
18 J. Andrew Coombs

Annie S. Wang

19 Attorneys for Plaintiffs Disney Enterprises,  
20 Inc., DC Comics, and Sanrio, Inc.  
21  
22  
23  
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25  
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27  
28

DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs Disney Enterprises, Inc., DC Comics, and Sanrio, Inc. hereby demand a trial by jury of all issues so triable.

DATED: August 24, 2012

J. Andrew Coombs, A Professional Corp.

By:

  
J. Andrew Coombs

Annie S. Wang

Attorneys for Plaintiffs Disney Enterprises, Inc., DC Comics, and Sanrio, Inc.

**EXHIBIT A****DEI'S COPYRIGHTED DESIGNS**

<b>Copyright Registration</b>	<b>Title of Work (Character)</b>	<b>Type of Work</b>
VA 58 937	Mickey - 1 (Mickey Mouse)	Model Sheet
VA 58 938	Minnie - 1 (Minnie Mouse)	Model Sheet
Gp 80 184	Donald Duck	Publications Model Sheet
VA 58 933	Daisy - 1 (Daisy Duck)	Model Sheet
VA 58 936	Goofy -1 (Goofy)	Model Sheet
Gp 80 192	Pluto	Publications Model Sheet
VAu 64 814	Baby Mickey	Model Sheet
VAu 64 814	Baby Minnie	Model Sheet
VAu 73 216	Baby Donald Duck	Model Sheet
VAu 73 217	Baby Daisy Duck	Model Sheet
VAu 83 225	Baby Goofy	Model Sheet
VAu 73 219	Baby Pluto	Model Sheet
R 48 971	Disney's Uncle Scrooge in Only a Poor Old Man	Comic Strip
RE 424 728	Walt Disney's Ludwig von Drake	Comic Strip
Gp 105 126	Horace Horsecollar	Model Sheet
R 567 615	Chip	Model Sheet
R 567 614	Dale	Model Sheet
VA 184 345	Huey, Dewey & Louie -1	Model Sheet
Gp 105 128	Clarabelle Cow	Model Sheet
RE 636 587	<b>Winnie the Pooh and the Honey Tree</b>	Motion Picture
RE 718 378	<b>Winnie the Pooh and the Blustery Day</b>	Motion Picture
VA 58 940	Pooh - 1 (Winnie the Pooh)	Model Sheet
Gp 81 528	Rabbit	Publications Model Sheet
Gp 81 528	Owl	Publications Model Sheet
Gp 85 651	Kanga and Roo	Publications Model Sheet
Gp 81 528	Eeyore	Publications Model Sheet
Gp 81 528	Piglet	Publications Model Sheet
Gp 81 528	Gopher	Publications Model Sheet
Gp 81 527	Tigger	Publications Model Sheet
R 354 235	<b>Snow White and the Seven Dwarfs</b>	Motion Picture
R 346 870	Bashful	Drawings
R 346 869	Doc	Drawings
R 346 875	Dopey	Drawings
R 346 876	Grumpy	Drawings



1	R 346 871	Happy	Drawings
2	R 346 874	Sleepy	Drawings
3	R 346 873	Sneezy	Drawings
4	R 346 872	Snow White	Drawings
5	R 346 868	Snow White "Witch"	Drawings
6	R 406 910	Pinocchio	Motion Picture
7	Gp 80 186	Pinocchio	Publications Model Sheet
8	Gp 80 188	Jiminy Cricket	Publications Model Sheet
9	R 427 860	Fantasia	Motion Picture
10	R 433 627	The Reluctant Dragon	Motion Picture
11	R 442 538	Dumbo	Motion Picture
12	R 428 428	Dumbo Suggestions for Dumbo	Drawing
13	R 428 420	Mother Elephant Suggestions for "Dumbo"	Drawing
14	R 428 430	Dumbo Ringmaster Suggestions 1348	Drawing
15	R 428 427	Dumbo - Stork Suggestions	Drawing
16	R 428 426	Timothy Mouse Suggestions	Drawing
17	R 428 432	Dumbo "Miscellaneous Crows" - 2006	Drawing
18	R 458 260	Bambi	Motion Picture
19	R 433 645	Bambi - Bambi	Drawing
20	R 433 630	Bambi - Final Thumper Model - 2002	Drawing
21	R 433 631	Bambi - Skunk Model - 2002	Drawing
22	R 433 636	Bambi - Owl and Stag Models	Drawing
23	R 433 632	Faline "Adolescent Age"	Drawing
24	R 433 633	Bambi's Mother	Drawing
25	R 467 541	Saludos Amigos	Motion Picture
26	R 464 785	Joe Carioca	Drawing
27	R 516 560	The Three Caballeros	Motion Picture
28	R 550 316	Make Mine Music	Motion Picture
	R 557 922	Song of the South	Motion Picture
	R 548 629	Brer Rabbit	Drawing
	R 548 626	Brer Bear	Drawing
	R 577 489	Fun and Fancy Free	Motion Picture
	R 605 180	Melody Time	Motion Picture
	R 636 303	The Adventures of Ichabod & Mr. Toad	Motion Picture
	R 648 396	Cinderella	Motion Picture
	R 632 319	Cinderella	Copyright Booklet
	R 632 319	Drizella	Copyright Booklet
	R 632 319	Anastasia	Copyright Booklet
	R 632 319	Stepmother	Copyright Booklet
	R 632 319	Fairy Godmother	Copyright Booklet
	R 632 319	Prince	Copyright Booklet
	R 632 319	Bruno, the Dog	Copyright Booklet
	R 632 319	Lucifer, the Cat	Copyright Booklet
	R 632 319	Jaq and Gus	Copyright Booklet
	RE 27 746	Alice in Wonderland	Motion Picture
	VA 58 920	Alice - 1 (Alice)	Model Sheet
	VA 58 919	Alice - 2 (The White Rabbit)	Model Sheet
	VA 58 921	Alice - 3 (Queen of Hearts)	Model Sheet

1	VA 58 922	Alice - 4 (Cheshire Cat)	Model Sheet
2	VA 58 923	Alice - 5 (Caterpillar)	Model Sheet
3	VA 58 924	Alice - 6 (Tweedledee and Tweedledum)	Model Sheet
4	VA 58 922	March Hare	Model Sheet
5	VA 58 922	Mad Hatter	Model Sheet
6	RE 64 027	<b>Peter Pan</b>	Motion Picture
7	RE 66 285	Peter Pan	Coloring Book
8	RE 66 285	Tinkerbell	Coloring Book
9	RE 66 285	Captain Hook	Coloring Book
10	RE 66 285	Mr. Smee	Coloring Book
11	RE 66 285	Nana	Coloring Book
12	RE 162 852	<b>Lady and the Tramp</b>	Motion Picture
13	RE 101 764	Lady	Previews of Pictures
14	RE 101 764	Tramp	Previews of Pictures
15	RE 296 296	<b>Sleeping Beauty</b>	Motion Picture
16	RE 246 671	Princess Aurora	Book
17	RE 246 671	Prince Phillip	Book
18	RE 246 671	Maleficent/Dragon	Book
19	RE 370 901	<b>One Hundred and One Dalmatians</b>	Motion Picture
20	RE 546 478	<b>The Sword in the Stone</b>	Motion Picture
21	RE 557 357	Archimedes	Copyright Booklet
22	RE 557 357	Merlin	Copyright Booklet
23	RE 557 357	Wart/Arthur	Copyright Booklet
24	RE 557 357	Madame Mim	Copyright Booklet
25	RE 571 201	<b>Mary Poppins</b>	Motion Picture
26	RE 705 510	<b>The Jungle Book</b>	Motion Picture
27	RE 679 798	Mowgli	Drawing
28	RE 679 799	Baloo	Drawing
	RE 679 795	Bagheera	Drawing
	RE 679 805	King Louie	Drawing
	RE 679 797	Kaa	Drawing
	RE 679 807	Shere Khan	Drawing
	Lp 38 283	<b>The Aristocats</b>	Motion Picture
	Gu 44 754	O'Malley	Drawing
	Gu 44 750	Duchess	Drawing
	Gu 44 748	Edgar	Drawing
	Gu 44 745	Roquefort	Drawing
	VA 1-099-033	Marie Valentine Spring 2002	Style Guide
	Lp 39 817	<b>Bedknobs and Broomsticks</b>	Motion Picture
	Gu 46 904	Crocky	Drawing
	Gu 46 908	Sailor Bear	Drawing
	Gu 46 906	Codfish	Drawing
	Gu 46 917	Secretary Bird	Drawing
	LP 42 905	<b>Robin Hood</b>	Motion Picture
	Gu 46 582	Robin Hood	Drawing
	Gu 46 583	Little John	Drawing
	Gu 46 584	Sir Hiss	Drawing
	Gu 47 230	Sheriff of Nottingham	Drawing
	Gu 47 762	Friar Tuck	Drawing

1	Gu 46 585	Prince John	Drawing
2	Gu 50 764	Maid Marion	Drawing
3	Gu 50 763	Lady Cluck	Drawing
4	Lp 49 678	<b>The Rescuers</b>	Motion Picture
5	Gp 96 289	Miss Bianca	Drawing
6	Gp 96 286	Orville	Drawing
7	Gp 96 288	Madame Medusa	Drawing
8	Gp 96 287	Bernard	Drawing
9	Gp 103 814	Penny	Drawing
10	Gu 57 278	Rufus	Drawing
11	Gu 56 625	Evinrude	Drawing
12	PA 1 371	<b>Pete's Dragon</b>	Motion Picture
13	Gp 111 695	Elliott the Dragon	Drawing
14	PA 125 861	<b>The Fox and the Hound</b>	Motion Picture
15	VAu 10 933	Todd (Young)	Drawing
16	VAu 10 930	Copper (Pup)	Drawing
17	VAu 10 936	Vixey	Drawing
18	VAu 10 928	Big Mama	Drawing
19	VAu 12 417	Dinky	Drawing
20	VAu 12 418	Boomer	Drawing
21	VAu 12 415	Squeeks	Drawing
22	PA 252 525	<b>The Black Cauldron</b>	Motion Picture
23	VAu 24 517	Eilonwy	Drawing
24	VAu 29 561	Fflewddur	Drawing
25	VAu 24 518	Gurgi	Drawing
26	VAu 24 070	Hen Wen	Drawing
27	VAu 24 592	The Horned King	Drawing
28	VAu 24 519	Taran	Drawing
	VAu 47 075	Orddu	Drawing
	VAu 47 073	Orgoch	Drawing
	VAu 47 074	Orwen	Drawing
	PA 290 808	<b>The Great Mouse Detective</b>	Motion Picture
	VAu 76 103	Basil 185-126	Model Sheet
	VAu 76 102	Dr. Dawson 1284-80	Model Sheet
	VAu 81 570	Olivia	Model Sheet
	VAu 76 100	Ratigan 285-166	Model Sheet
	VAu 81 572	Fidget	Model Sheet
	VAu 81 571	Flaversham	Model Sheet
	VAu 86 112	Felicia - Clean Up Model 0238	Model Sheet
	VAu 76 104	Toby 285-170	Model Sheet
	VAu 85 019	Mrs. Judson	Model Sheet
	VAu 85 021	Queen Victoria	Model Sheet
	VAu 85 022	Bartholomew	Model Sheet
	PA 385 556	<b>Oliver and Company</b>	Motion Picture
	VAu 104 921	Dodger Construction Sheets	Model Sheet
	VAu 104 920	Einstein Construction Sheets	Model Sheet
	VAu 104 919	Frances Construction Sheets	Model Sheet
	VAu 104 916	Rita Construction Sheets	Model Sheet
	VAu 109 377	Oliver Rough Model	Model Sheet

1	VAu 109 379	Tito - Ruff Model	Model Sheet
2	VAu 119 949	How to Draw Georgette	Model Sheet
3	PA 431 543	<b>The Little Mermaid</b>	Motion Picture
4	VAu 123 355	Ariel 9-9-87 Ruff (Ariel)	Drawings
5	VAu 123 351	Scuttle	Drawings
6	VAu 123 354	Ruff Sebastion 9-4-87 (Sebastian)	Drawings
7	VAu 123 348	Ruff Ursula 9-9-87 (Ursula)	Drawings
8	VAu 123 352	Prince Eric	Drawings
9	VAu 123 350	Triton	Drawings
10	VAu 123 353	Flotsam/Jetsam	Drawings
11	VAu 123 349	Flounder	Drawings
12	PAu 1 024 341	<b>DuckTales</b>	Motion Picture
13	VAu 101 067	Launchpad McQuack	Pamphlet of Drawings
14	VAu 101 067	Webby	Pamphlet of Drawings
15	VAu 101 067	Doofus	Pamphlet of Drawings
16	VAu 101 067	Mrs. Beakley	Pamphlet of Drawings
17	VAu 101 067	Duckworth	Pamphlet of Drawings
18	PA 486 535	<b>The Rescuers Down Under</b>	Motion Picture
19	VAu 161 749	Cody	Model Sheets
20	VAu 155 884	Jake (Rough Models)	Model Sheets
21	VAu 155 844	McLeach (Rough Model)	Model Sheets
22	VAu 170 264	Marahute (Rough Model)	Model Sheets
23	PA 542 647	<b>Beauty and the Beast</b>	Motion Picture
24	VAu 200 866	Belle (Beauty and the Beast)	Artwork
25	VAu 210 914	Beast	Licensing Kit
26	VAu 194 311	Maurice (Beauty and the Beast)	Artwork
27	VAu 199 855	Mrs. Potts (Beauty and the Beast)	Artwork
28	VAu 200 868	Cogsworth (Beauty and the Beast)	Artwork
	VAu 194 310	Lumiere (Beauty and the Beast)	Artwork
	VAu 201 337	Chip (Beauty and the Beast)	Artwork
	VAu 194 307	Gaston (Beauty and the Beast)	Artwork
	VAu 194 309	LeFou (Beauty and the Beast)	Artwork
	VAu 199 856	Phillipe (Beauty and the Beast)	Artwork
	VAu 200 869	Featherduster (Beauty and the Beast)	Artwork
	PA 583 905	<b>Aladdin</b>	Motion Picture
	VAu 215 432	Aladdin - Aladdin	Model Sheet
	VAu 215 453	Aladdin - Genie	Model Sheet
	VAu 215 793	Aladdin - Abu	Model Sheet
	VAu 218 349	Aladdin - Iago	Model Sheet
	VAu 230 534	Aladdin - Rasoul	Model Sheet
	VAu 218 348	Aladdin - The Sultan	Model Sheet
	VAu 230 533	Aladdin - Jafar	Model Sheet
	VAu 221 841	Aladdin - Jasmine	Model Sheet
	VAu 221 842	Aladdin - Jafar as Beggar	Model Sheet
	VAu 232 164	Aladdin - Narrator	Model Sheet



1	PA 659 979	<b>The Lion King</b>	Motion Picture
2	VAu 246 448	The Lion King - Mufasa	Model Sheet
3	VAu 245 946	The Lion King - Sarabi	Model Sheet
4	VAu 246 447	The Lion King - Simba	Model Sheet
5	VAu 246 440	The Lion King - Young Simba	Model Sheet
6	VAu 246 438	The Lion King - Nala	Model Sheet
7	VAu 246 664	The Lion King - Young Nala	Model Sheet
8	VAu 245 947	The Lion King - Rafiki	Model Sheet
9	VAu 245 945	The Lion King - Shenzi, Banzai & Ed	Model Sheet
10	VAu 246 437	The Lion King - Pumbaa	Model Sheet
11	VAu 245 662	The Lion King - Timon	Model Sheet
12	VAu 246 446	The Lion King - Scar	Model Sheet
13	VA 611 201	Zazu	Licensing Kit
14	PA 720 179	<b>Pocahontas</b>	Motion Picture
15	VAu 262 859	Pocahontas - Pocahontas Standing	Artwork
16	VAu 261 970	Pocahontas - Powhatan	Artwork
17	VAu 261 967	Pocahontas - Percy	Artwork
18	VAu 302 884	Pocahontas - John Smith	Artwork
19	VAu 302 886	Pocahontas - Meeko the Raccoon	Artwork
20	VAu 302 883	Pocahontas - Flit the Hummingbird	Artwork
21	VAu 300 559	Pocahontas - Ratcliffe	Artwork
22	VAu 302 885	Pocahontas - Grandmother Willow	Artwork
23	PA 765 713	<b>Toy Story</b>	Motion Picture
24	VAu 337 565	Toy Story - Woody	Artwork
25	VAu 337 566	Toy Story - Buzz Lightyear	Artwork
26	VAu 337 567	Toy Story - Hamm	Artwork
27	VAu 337 568	Toy Story - Rex	Artwork
28	VAu 337 569	Toy Story - Bo Peep Lamp and Sheep	Artwork
	VAu 337 186	Toy Story - Lenny	Artwork
	VAu 273 627	Toy Story - Mom	Artwork
	VAu 348 598	Toy Story - Andy	Artwork
	VAu 348 599	Toy Story - Hannah	Artwork
	PA 795 221	<b>The Hunchback of Notre Dame</b>	Motion Picture
	VAu 336 992	The Hunchback of Notre Dame - Quasimodo	Model Sheet
	VAu 332 434	The Hunchback of Notre Dame - Esmeralda	Model Sheet
	VAu 336 056	The Hunchback of Notre Dame - Phoebus	Model Sheet
	VAu 336 057	The Hunchback of Notre Dame - Djali	Model Sheet
	VAu 343 663	The Hunchback of Notre Dame - Gargoyles	Model Sheets
	VAu 336 058	The Hunchback of Notre Dame - Clopin	Model Sheet
	VAu 336 059	The Hunchback of Notre Dame - Frollo	Model Sheet
	VAu 336 878	The Hunchback of Notre Dame - Will Doll/Sam Doll	Model Sheet
	PA 670 961	<b>Hercules</b>	Motion Picture
	VAu 369 603	Hercules - Hercules	Model Sheets
	VAu 369 600	Hercules - Baby Hercules	Model Sheets
	VAu 367 973	Hercules - Meg	Model Sheets
	VAu 369 605	Hercules - Pegasus	Model Sheets
	VAu 369 598	Hercules - Baby Pegasus	Model Sheets
	VAu 367 965	Hercules - Phil	Model Sheets
	VAu 367 964	Hercules - Hades	Model Sheets



1	VAu 367 969	Hercules - Pain	Model Sheets
2	VAu 375 850	Hercules - Panic	Model Sheets
3	VAu 377 944	Hercules - Hydra Head	Model Sheet
4	PA 799 025	<b>Mulan</b>	Motion Picture
5	VA 849 510	Mulan	Style Guide
6	VAu 379 045	The Legend of Mulan - Mulan	Model Sheets
7	VAu 379 027	The Legend of Mulan - Mulan as Ping	Model Sheets
8	VAu 379 021	The Legend of Mulan - Mushu	Model Sheets
9	VAu 379 024	The Legend of Mulan - Shang	Model Sheets
10	VAu 378 480	The Legend of Mulan - Kahn	Model Sheets
11	VAu 381 069	The Legend of Mulan - Cricket	Model Sheets
12	PA 901 890	<b>A Bug's Life*</b>	Motion Picture
13	VA 875 986	A Bug's Life*	Style Guide
14	VAu 399 357	Flik*	Model Sheets
15	VAu 399 356	Hopper*	Model Sheets
16	VAu 399 351	Atta*	Model Sheets
17	VAu 399 349	Dot*	Model Sheets
18	VAu 399 343	Dim*	Model Sheets
19	VAu 399 352	Tuck & Roll*	Model Sheets
20	VAu 399 350	Francis*	Model Sheets
21	VAu 399 348	Heimlich*	Model Sheets
22	VAu 399 353	Slim*	Model Sheets
23	VAu 399 342	Rosie*	Model Sheets
24	VAu 399 346	P.T. Flea*	Model Sheets
25	VAu 399 345	Manny*	Model Sheets
26	VAu 399 344	Gypsy*	Model Sheets
27	VAu 399 347	Thumper*	Model Sheets
28	VAu 399 354	Molt*	Model Sheets
	VAu 399 355	Queen*	Model Sheets
	PA 959 870	<b>Toy Story 2*</b>	Motion Picture
	VAu 414 563	Toy Story 2 - Al's Car*	Model Sheet
	VAu 405 573	Toy Story 2 - Bullseye*	Model Sheet
	VAu 406 700	Toy Story 2 - Coffee Table*	Model Sheet
	VAu 407 195	Toy Story 2 - Cushy Chair*	Model Sheet
	VAu 405 571	Toy Story 2 - Emporer Zurg*	Model Sheet
	VAu 405 572	Toy Story 2 - Jessie*	Model Sheet
	VAu 405 197	Toy Story 2 - L'il Yuppier*	Model Sheet
	VAu 405 574	Toy Story 2 - Prospector*	Model Sheet
	VAu 407 196	Toy Story 2 - Wood Chair*	Model Sheet
	VA960 902	Toy Story 2 - Style Guide*	Style Guide
	PA 974 011	<b>Dinosaur</b>	Motion Picture
	VAu 486 473	Aladar	Model Sheet
	VAu 486 477	Baylene	Model Sheet
	VAu 486 476	Bruton	Model Sheet
	VAu 486 478	Eema	Model Sheet
	VAu 486 475	Kron	Model Sheet
	VAu 486 474	Neera	Model Sheet
	VAu 486 472	Plio	Model Sheet
	VAu 486 479	Suri	Model Sheet

1	VAu 486 471	Yar	Model Sheet
2	VA 996 530	Dinosaur - Phase I	Style Guide
3	VA 992 942	Dinosaur - Phase II	Style Guide
4	PA 940 885	<b>The Emperor's New Groove</b>	Motion Picture
5	VA 999 573	Emperor's New Groove	Style Guide
6	VAu 479 682	Kronk	Model Sheet
7	VAu 479 685	Kuzco	Model Sheet
8	VAu 479 683	Kuzco Llama	Model Sheet
9	VAu 479 684	Pacha	Model Sheet
10	VAu 479 681	Yzma	Model Sheet
11	PA 1-250-536	<b>The Incredibles</b>	Motion Picture
12	VA 1-242-351	The Incredibles	Style Guide
13	PA 1-322-908	<b>Cars</b>	Motion Picture
14	VA 1-326-323	Cars – Style Guide	Style Guide
15	VA 1-403-647	Hannah Montana – Branding Guide	Style Guide
16	PA 659-601	<b>Tim Burton's The Nightmare Before Christmas</b>	Motion Picture
17	PA 1-313-530	<b>High School Musical</b>	Motion Picture
18	VA 1-405-082	High School Musical – Branding Guide	Style Guide
19	PA 1-627-575	<b>Hannah Montana the Movie</b>	Motion Picture
20	PA 1-635-067	<b>Up</b>	Motion Picture
21	PA 1-641-991	<b>G-Force</b>	Motion Picture
22	PA 1-606-305	<b>Wall-E</b>	Motion Picture
23	VA 1-663-815	Wall-E – Branding and Supplement Style Guide RSM 2008	Style Guide
24	PA 1-598-561	<b>High School Musical 2</b>	Motion Picture
25	VA 1-651-813	High School Musical 2 – Summer 2008 Style Guide Supplement	Style Guide
26	PA 1-613-593	<b>High School Musical 3: Senior Year</b>	Motion Picture
27	VA 1-655-713	Beverly Hills Chihuahua	One Sheet
28	PA 1-611-956	<b>Beverly Hills Chihuahua</b>	Motion Picture
	Pau 2-921-728	Little Mermaid III: Ariel's Beginning	Screenplay
	VA 515-038	Little Mermaid III: Ariel's Beginning	Comic Book
	PA 1-623-231	<b>Bedtime Stories</b>	Motion Picture
	PA 1-588-972	<b>Underdog</b>	Motion Picture
	PA 1-595-126	<b>Enchanted</b>	Motion Picture
	PA 1-332-118	<b>Meet the Robinsons</b>	Motion Picture
	VA 1-358-218	Meet the Robinsons—Style Guide	Style Guide
	PA 1-122-518	<b>Cinderella II : Dreams come true / produced by Walt Disney Television Animation ; directed by John Kafka</b>	Motion Picture
	PA 1-612-331	<b>Cinderella III: A Twist in Time</b>	Motion Picture
	PA 1-611-943	<b>Tinker Bell</b>	Motion Picture
	PA 1-617-950	<b>Bolt</b>	Motion Picture
	VA 1-663-828	Bolt – Fall/Winter Style Guide 2008	Style Guide
	PA 1-688-323	<b>Toy Story 3</b>	Motion Picture
	VA 1-800-737	Toy Story 3: GC Product Dev – Style Guide – Spring/Summer 2010	Style Guide

PA 1-348-114	Handy Manny: no. 1-01	Motion Picture
VAu 959-473	Handy Manny Design Pack – Characters	Drawings
VA 1-650-599	Handy Manny Repair Shop – Spring/Summer 2008 Product Development Guide	Style Guide

**EXHIBIT B**  
**DEI'S TRADEMARKS**

Trademark	Mark Drawing Code	Trademark Registration No.	Trademark Registration Date
Mickey Mouse	Typed Drawing	3,115,395	7/11/2006
Mickey Mouse	Standard Character Mark	3,767,849	3/30/2010
Mickey Mouse	Typed Drawing	3,006,349	10/11/2005
Mickey Mouse	Typed Drawing	0,315,056	7/17/1934
Mickey Mouse	Standard Character Mark	3,750,188	2/16/2010
Mickey Mouse	Typed Drawing	1,152,389	4/28/1981
Mickey Mouse	Design Only	2,704,887	4/8/2003
Mickey Mouse Head Device	Design Only	2,781,693	11/11/2003
Minnie Mouse	Typed Drawing	3,102,338	6/06/2006
Minnie Mouse	Design Only	2,700,619	3/25/2003
Minnie Mouse	Standard Character Mark	3,767,850	3/30/2010
Minnie Mouse	Standard Character Mark	3,740,338	1/19/2010
Minnie Mouse	Typed Drawing	3,002,502	9/27/2005
Pluto	Typed Drawing	1,152,383	4/28/1981
Pluto	Design Only	2,707,323	4/15/2003
Goofy	Typed Drawing	1,159,124	6/30/1981
Goofy	Design Only	2,721,608	6/3/2003
Donald Duck	Typed Drawing	1,161,868	7/21/1981
Donald Duck	Design Only	2,700,620	3/25/2003

Donald Duck	Typed Drawing	3,150,077	9/26/2006
Daisy Duck	Design Only	2,704,890	4/8/2003
Disney	Typed Drawing	1,162,727	7/28/1981
Disney	Typed Drawing	3,490,082	8/19/2008
Disney Princess	Standard Character Mark	3,459,442	7/1/2008
Walt Disney	Typed Drawing	1,141,312	11/11/1980
Walt Disney Signature	Standard Character Mark	3,584,878	3/3/2009
Winnie the Pooh	Typed Drawing	3,024,287	12/6/2005
Pooh	Design Only	2,704,888	4/8/2003
Pooh	Typed Drawing	3,395,652	3/11/2008
Piglet	Standard Character Mark	4,118,780	3/27/2012
Piglet	Design Only	2,700,618	3/25/2003
Tigger	Design Only	2,860,445	7/6/2004
Eeyore	Design Only	3,591,616	3/17/2009
Eeyore	Typed Drawing	3,464,628	7/8/2008
Eeyore	Standard Character Mark	3,658,573	7/21/2009
Walt Disney's Cinderella	Design Plus Words, Letters, and/or Numbers	3,057,988	2/7/2006
Walt Disney's Snow White & the Seven Dwarfs	Design Plus Words, Letters, and/or Numbers	2,891,463	10/5/2004
Walt Disney's Sleeping Beauty	Design Plus Words, Letters, and/or Numbers	2,895,966	10/19/2004
Sleeping Beauty	Standard Character Mark	3,775,134	4/13/2010
Peter Pan	Standard Character Mark	3,745,492	2/2/2010

Walt Disney's Peter Pan	Design Plus Words, Letters, and/or Numbers	2,895,967	10/19/2004
Peter Pan	Standard Character Mark	3,662,111	7/28/2009
Tinker Bell	Standard Character Mark	3,648,929	7/20/2006
Tinker Bell	Standard Character Mark	3,636,910	6/9/2009
Tinker Bell	Design Only	3,624,833	5/19/2009
Tink	Typed Drawing	3,734,512	1/5/2010
Hannah Montana	Standard Character Mark	3,478,026	7/29/2008
Hannah Montana	Standard Character Mark	3,413,555	4/15/2008
Hannah Montana	Standard Character Mark	3,473,757	7/22/2008
Hannah Montana	Standard Character Mark	3,413,552	4/15/2008
Lilo & Stitch	Typed Drawing	2,811,097	2/3/2004
Lilo & Stitch	Typed Drawing	2,845,107	5/25/2004
Pinocchio	Standard Character Mark	Serial Number 77618061	n/a
Pinocchio	Standard Character Mark	Serial Number 77625073	n/a
Cars	Design Plus Words, Letters, and/or Numbers	3,358,115	12/18/2007
Cars	Design Plus Words, Letters, and/or Numbers	3,178,664	11/28/2006
Lightning McQueen	Standard Character Mark	3,370,157	1/15/2008
Mater	Standard Character Mark	3,406,600	4/1/2008
Rust-Eze	Standard Character Mark	3,294,617	9/18/2007
Doc Hudson	Standard Character Mark	3,321,900	10/23/2007
Toy Story	Typed Drawing	2,520,404	12/18/2001



Toy Story	Standard Character Mark	3,971,114	5/31/2011
Ariel	Standard Character Mark	3,814,910	7/6/2010
Beauty and the Beast	Typed Drawing	2,961,693	6/14/2005
Princess Jasmine	Standard Character Mark	3,998,366	7/19/2011
Princess Jasmine	Standard Character Mark	Serial Number 85,182,806	n/a
High School Musical	Standard Character Mark	3,506,572	9/23/2008
High School Musical	Standard Character Mark	3,433,096	5/20/2008
High School Musical	Standard Character Mark	3,420,394	10/24/2006
High School Musical	Standard Character Mark	3,469,823	7/15/2008
Meet the Robinsons	Standard Character Mark	3,420,082	4/29/2008
Meet the Robinsons	Standard Character Mark	3,354,473	12/11/2007
The Cheetah Girls	Standard Character Mark	3,252,269	6/12/2007
Walt Disney Pictures Presents The Wild	Standard Character Mark	3,389,689	2/26/2008
Disney Bolt	Standard Character Mark	3,648,251	6/30/2009
Disney Bolt	Standard Character Mark	3,604,222	4/7/2009
Wall-E	Standard Character Mark	3,686,824	9/22/2009
Wall-E	Standard Character Mark	3,528,986	11/4/2008
Handy Manny	Standard Character Mark	3,276,261	8/7/2007
Handy Manny	Standard Character Mark	3,643,979	6/23/2009

**EXHIBIT C****DC COMICS' COPYRIGHTED DESIGNS**

<b>Copyright Registration</b>	<b>Title of Work (Character)</b>	<b>Type of Work</b>
Txu 1-080-661	DC Comics Anti-Piracy Guide Batman Robin Superman Wonderwoman Supergirl Justice League	Style Guide
VAu 1-059-478	DC Comics Anti-Piracy Style Guide	Style Guide
TX 5-581-762	Superman	Monthly Publication
TX 3-221-758	Superman	Style Guide
TXu-532-372	DC Comics style guide.	visual arts

**EXHIBIT D****DC COMICS' TRADEMARKS**

Trademark	Trademark Registration No.	Trademark Registration Date
Bat Emblem	1,581,725	2/6/1990
Bat Emblem	1,581,593	2/6/1990
Bat Emblem	1,581,659	2/6/1990
Bat Emblem	2,119,266	12/9/1997
Bat Emblem (BATMAN BEGINS)	3,299,017	9/25/2007
Bat Emblem (BATMAN BEGINS)	3,110,604	6/27/2006
Bat Emblem (BATMAN BEGINS)	3,326,043	10/30/2007
Bat Emblem (BATMAN BEGINS)	3,313,612	10/16/2007
Bat Rep II	1,219,120	12/7/1982
BATARANG	3,291,749	9/11/2007
BATCAVE	4,135,575	5/1/2012
BATGIRL	3,070,999	3/21/2006
BATLINK	2,483,295	8/28/2001
BATMAN	856,045	9/3/1968
BATMAN	828,412	5/9/1967
BATMAN	839,561	11/28/1967
BATMAN	858,860	10/22/1968
BATMAN	1,221,720	12/28/1982
BATMAN	1,652,640	6/30/1991
BATMAN	1,622,749	11/13/1990
BATMAN	2,457,655	6/5/2001
BATMAN & ROBIN	2,171,937	6/7/1998
BATMAN & ROBIN	2,404,483	11/14/2000
BATMAN & ROBIN	2,245,040	5/11/1999
BATMAN BEYOND	2,762,067	9/3/2003

1	BATMAN BEYOND	2,688,935	2/18/2003
2	BATMAN BEYOND	2,649,865	11/12/2002
3	BATMAN BEYOND	2,643,418	10/29/2002
4	BATMAN on Bat Rep	382,770	11/12/1940
5	BATMAN on Bat Rep II (Side Face) (3D)	804,709	3/1/1966
6	Batman Rope Rep	1,262,504	12/27/1983
7	BATMAN THE RIDE	1,861,233	11/1/1994
8	BATMOBILE	1,124,961	9/11/1979
9	BATMOBILE (By Assignment)	1,179,342	11/24/1981
10	BATWING & Bat Emblem (outline)	2,858,716	6/29/2004
11	CATWOMAN	3,181,586	12/5/2006
12	CATWOMAN	1,052,504	11/9/1976
13	CATWOMAN	1,565,883	11/14/1989
14	CATWOMAN	1,883,034	3/7/1995
15	CATWOMAN	1,966,766	4/9/1996
16	DAILY PLANET	3,018,523	11/22/2005
17	DAILY PLANET	3,066,593	3/7/2006
18	DAILY PLANET	3,349,268	12/4/2007
19	DOUBLE W Design	1,332,090	4/23/1985
20	GOTHAM CENTRAL	3,391,794	3/4/2008
21	GOTHAM CITY	3,353,156	12/11/2007
22	GOTHAM GIRLS	2,868,577	8/3/2004
23	GOTHAM KNIGHTS	3,391,795	3/4/2008
24	JIMMY OLSEN	1,190,637	2/23/1982
25	JOKER	1,052,503	11/9/1976
26	KRYPTO	1,168,306	9/8/1981
27	KRYPTO THE SUPERDOG	3,061,112	2/21/2006
28	KRYPTO THE SUPERDOG	3,018,682	11/22/2005

1	KRYPTO THE SUPERDOG & S in Shield & Rep (in Flying Cape)	3,066,745	3/7/2006
2			
3	KRYPTONITE	1,239,506	5/24/1983
4	KRYPTONITE	2,656,768	12/3/2002
5	LEX LUTHOR	1,634,007	2/5/1991
6	LEX LUTHOR	2,802,600	1/6/2004
7	LOIS & CLARK	3,355,918	12/18/2007
8	LOIS LANE	2,781,372	11/11/2003
9	LOIS LANE	1,184,702	1/5/1982
10	MAN OF STEEL	2,226,436	2/23/1999
11	MR. FREEZE	2,157,292	5/12/1998
12	ROBIN	1,294,617	9/11/1984
13	ROBIN	1,930,901	10/31/1995
14	Robin Rep II	1,279,991	5/29/1984
15	S Logo	1,197,814	6/15/1982
16	S Logo	1,182,041	12/15/1981
17	S Logo	1,199,552	6/29/1982
18	S Logo	1,199,630	6/29/1982
19	S Logo	1,182,172	12/15/1981
20	S Logo	1,189,376	2/9/1982
21	S Logo	1,184,881	1/5/1982
22	S Logo	1,199,690	6/29/1982
23	S Logo	1,179,537	11/24/1981
24	S Logo	2,226,415	2/23/1999
25	S Logo	2,211,378	12/15/1981
26	S Logo (black)	1,140,418	10/14/1980
27	S Logo (black)	1,173,150	10/13/1981
28	SUPERGIRL	2,023,091	12/6/2005
	SUPERGIRL	2,943,882	4/26/2005

1	SUPERGIRL	1,238,334	5/17/1983
2	SUPERGIRL in Telescopic	414,623	6/19/1945
3	SUPERMAN	3,615,518	5/5/2009
4	SUPERMAN	1,070,290	7/26/1977
5	SUPERMAN	648,647	7/16/1957
6	SUPERMAN	1,184,822	1/5/1982
7	SUPERMAN	1,175,907	11/3/1981
8	SUPERMAN	1,180,068	12/1/1981
9	SUPERMAN	1,209,668	9/21/1982
10	SUPERMAN	1,182,947	12/22/1981
11	SUPERMAN	1,186,803	1/19/1982
12	SUPERMAN	1,183,841	12/29/1981
13	SUPERMAN	1,189,393	2/9/1982
14	SUPERMAN	1,248,822	8/23/1983
15	SUPERMAN	1,216,976	11/16/1982
16	SUPERMAN	1,181,536	12/8/1981
17	SUPERMAN	1,221,718	12/28/1982
18	SUPERMAN	2,204,195	11/17/1998
19	SUPERMAN	2,419,510	1/9/2001
20	SUPERMAN in Telescopic	1,185,526	1/12/1982
21	SUPERMAN in Telescopic	1,183,809	12/29/1981
22	SUPERMAN in Telescopic	1,185,853	1/12/1982
23	SUPERMAN in Telescopic	1,189,355	2/9/1982
24	SUPERMAN in Telescopic	1,200,394	7/6/1982
25	SUPERMAN in Telescopic	1,220,896	12/21/1982
26	SUPERMAN in Telescopic	1,182,226	12/15/1981
27	SUPERMAN in Telescopic	1,209,863	9/21/1982
28	SUPERMAN in Telescopic	1,218,552	11/30/1982
	SUPERMAN in Telescopic	1,181,537	12/8/1981



1	SUPERMAN in Telescopic	2,226,026	2/23/1999
2	SUPERMAN in Telescopic & Chains Rep II (Midrift)	391,821	11/25/1941
3	SUPERMAN in Telescopic (By Assignment)	371,803	10/10/1939
4	SUPERMAN in Telescopic (color)	1,108,577	12/12/1978
5	Superman Rep III (Running)	1,180,292	12/1/1981
6	Superman Rep III (Running)	1,178,048	11/17/1981
7	Superman Rep IV (Hands on Hips)	1,201,149	7/13/1982
8	Superman Rep IX (Flying Figure)	1,200,387	7/6/1982
9	Superman Rep V (Running)	1,209,743	9/21/1982
10	Superman Rep VI (Flying Figure)	1,201,167	7/13/1982
11	Superman Rep VII (Stepping-Up)	1,235,769	4/26/1983
12	Superman Rep VIII (Flying Figure)	1,229,321	3/8/1983
13	Superman Rep X (Standing Clenched Fists)	1,200,233	7/6/1982
14	SUPERMAN RIDE OF STEEL	2,485,624	9/4/2001
15	THE DARK KNIGHT	3,680,537	9/8/2009
16	THE DARK KNIGHT	3,690,538	9/8/2009
17	THE DARK KNIGHT	3,680,539	9/8/2009
18	THE DARK KNIGHT	1,458,274	9/22/1987
19	The Joker Rep	1,256,974	11/8/1983
20	THE MAN OF STEEL	1,433,864	3/24/1987
21	The Penguin Rep III (Jumping)	1,236,489	5/3/1983
22	TWO FACE	2,009,805	10/22/1996
23	WONDER WOMAN	1,221,717	12/28/1982
24	WONDER WOMAN	1,388,425	4/1/1986
25	WONDER WOMAN Logo	820,334	12/13/1966
26	WONDER WOMAN Logo II	395,739	6/9/1942
27	Wonder Woman Rep III	1,236,490	5/3/1983

**EXHIBIT E**  
**SANRIO CO.'S COPYRIGHTED DESIGNS**

Copyright Registration	Title of Work (Character)	Type of Work
TX 3-769-888	SANRIO 1993 Product and Sales Promotion Catalog	Literary Work
VAu 684-322	Sanrio 2005 Character Guide	Graphic Artwork
VA 1-303-874	Character Merchandising	Collective work of artwork, text and photos
VA 1-296-115	2004 – 100 Characters	Graphic Artwork
VA 811-440	Bad Badtz Maru	Graphic Artwork
VAu 498-617	Chococat	Art original
VA 130-420	Hello Kitty	Graphic Artwork
VA 636-579	KeroKeroKeroppi	Sticker Book
VA 707-212	KeroKeroKeroppi	Pictorial Cartoon Drawing
VA 246-421	Little Twin Stars	Stickers
VA 840-495	Monkichi	Graphic Artwork
VA 130-419	My Melody	Graphic Artwork
VA 130-421	Patty & Jimmy	Graphic Artwork
VA 636-582	Pekkle	Graphic Artwork
VA 840-496	Picke Bicke	Graphic Artwork
VA 636-580	Pochaco	Sticker Book
VA 148-625	Tuxedo Sam	Stickers
VA 840-494	Winkipinki	Graphic Artwork
VA 636-581	Zashikibuta	Stickers
VA 1-352-721	Keroppi / Little Frog...Big Splash	Visual Material
Vau 1-078-385	Sanrio 2010 Character Guide	Visual Material

**EXHIBIT F****SANRIO'S TRADEMARKS**

Trademark	Mark Drawing Code	Trademark Registration No.	Trademark Registration Date
Chococat	Design Plus Words, Letters, and/or Numbers	2,842,707	5/18/04
Chococat	Design Plus Words, Letters, and/or Numbers	2,707,592	4/15/03
Chococat	Design Plus Words, Letters, and/or Numbers	2,705,164	4/8/03
Chococat	Design Plus Words, Letters, and/or Numbers	2,714,130	5/6/03
Chococat	Design Plus Words, Letters, and/or Numbers	2,952,043	5/17/05
Chococat	Design Plus Words, Letters, and/or Numbers	2,845,315	5/25/04
Hello Kitty	Design Only	1,200,083	7/6/82
Hello Kitty	Design Only	1,277,721	5/15/84
Hello Kitty	Typed Drawing	1,215,436	11/9/82
Hello Kitty	Typed Drawing	1,279,486	5/29/84
Hello Kitty	Typed Drawing	1,391,550	4/29/86
Hello Kitty	Design Only	1,370,105	11/12/85
Keroppi	Standard Character Mark	3,531,383	11/11/08
Keroppi	Standard Character Mark	3,181,350	12/5/06
Keroppi	Standard Character Mark	3,531,382	11/11/08
Keroppi	Standard Character Mark	3,181,349	12/5/06
Keroppi	Standard Character Mark	3,436,548	5/27/08
Keroppi	Standard Character Mark	3,181,348	12/5/06

1	Keroppi	Standard Character Mark	3,181,347	12/5/06
2	Keroppi	Standard Character Mark	3,449,938	6/17/08
3	Keroppi	Standard Character Mark	3,531,381	11/11/08
4	Keroppi	Standard Character Mark	3,531,380	11/11/08
5	Keroppi	Standard Character Mark	3,181,346	12/5/06
6	Keroppi	Standard Character Mark	3,423,288	5/6/08
7	Keroppi	Standard Character Mark	3,181,345	12/5/06
8	Little Twin Stars	Typed Drawing	1,341,864	6/18/85
9	Little Twin Stars	Typed Drawing	1,192,946	4/6/82
10	Little Twin Stars	Standard Character Mark	3,245,999	5/29/07
11	Little Twin Stars	Standard Character Mark	3,245,998	5/29/07
12	Little Twin Stars	Standard Character Mark	3,245,997	5/29/07
13	Little Twin Stars	Standard Character Mark	3,245,994	5/29/07
14	Little Twin Stars	Standard Character Mark	3,245,993	5/29/07
15	Little Twin Stars	Standard Character Mark	3,245,992	5/29/07
16	Little Twin Stars	Standard Character Mark	3,245,991	5/29/07
17	Monkichi	Standard Character Mark	3,699,381	10/20/09
18	My Melody	Typed Drawing	1,305,637	11/20/84
19	My Melody	Typed Drawing	1,210,192	9/28/82
20	Pekkle	Typed Drawing	2,053,346	4/15/97
21	Pochacco	Typed Drawing	2,236,507	4/6/99
22	Pochacco	Typed Drawing	1,985,358	7/9/96

Sanrio	Design Plus Words, Letters, and/or Numbers	2,506,705	11/13/01
Sanrio	Typed Drawing	2,506,577	11/13/01
Sanrio	Design Plus Words, Letters, and/or Numbers	2,721,680	6/3/03
Sanrio	Design Plus Words, Letters, and/or Numbers	2,742,381	7/29/03
Sanrio	Design Plus Words, Letters, and/or Numbers	2,721,679	6/3/03
Sanrio	Design Plus Words, Letters, and/or Numbers	2,693,639	3/4/03
Sanrio	Design Plus Words, Letters, and/or Numbers	2,696,063	3/11/03
KEROKEROKEROPPI	Standard Character Mark	3,531,378	11/11/2008
KEROKEROKEROPPI	Standard Character Mark	3,531,376	11/11/2008
Bow	Design only	3,260,857	7/10/2007
Bow	Design only	3,359,800	12/25/2007
Bow	Design only	3,359,801	12/25/2007
Bow	Design only	3,272,377	7/31/2007
Bow	Design only	3,260,860	7/10/2007
Bow	Design only	3,362,512	1/1/2008
Bow	Design only	3,348,608	12/4/2007
Bow	Design only	3,249,704	6/5/2007
Bow	Design only	3,362,514	1/1/2008
Bow	Design only	3,359,799	12/25/2007
Bow	Design only	3,260,858	7/10/2007

Bow	Design only	3,445,304	6/10/2008
Bow	Design only	3,260,859	7/10/2007
Bow	Design only	3,359,802	12/25/2007
Bow	Design only	3,260,861	7/10/2007
Bow	Design only	3,253,794	6/19/2007
Bow	Design only	3,260,862	7/10/2007
Outline of Hello Kitty	Design only	3,666,736	8/11/2009
Outline of Hello Kitty	Design only	3,756,724	3/9/2010
Outline of Hello Kitty	Design only	3,751,315	2/23/2010
Outline of Hello Kitty	Design only	3,868,138	10/26/2010
Outline of Hello Kitty	Design only	3,756,725	3/9/2010
Outline of Hello Kitty	Design only	3,666,736	8/11/2009
Outline of Hello Kitty	Design only	3,679,187	9/8/2009
Outline of Hello Kitty	Design only	3,865,208	10/19/2010
Dear Daniel	Standard Character Mark	3,072,626	3/28/2006
Dear Daniel	Standard Character Mark	3,067,244	3/14/2006



**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY**

This case has been assigned to District Judge Dean D. Pregerson and the assigned discovery Magistrate Judge is Jacqueline Chooljian.

The case number on all documents filed with the Court should read as follows:

**CV12- 7347 DDP (JCx)**

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

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**NOTICE TO COUNSEL**

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

Subsequent documents must be filed at the following location:

☐ **Western Division**  
312 N. Spring St., Rm. G-8  
Los Angeles, CA 90012

☐ **Southern Division**  
411 West Fourth St., Rm. 1-053  
Santa Ana, CA 92701-4516

☐ **Eastern Division**  
3470 Twelfth St., Rm. 134  
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

J. Andrew Coombs (SBN 123881)  
 Annie S. Wang (SBN 243027)  
 J. Andrew Coombs, A Prof. Corp.  
 517 E. Wilson Ave., Suite 202  
 Glendale, California 91206  
 Tel.: (818) 500-3200 / Fax: (818) 500-3201

COPY

UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA

Disney Enterprises, Inc., DC Comics, Hanna-Barbera  
 Productions, Inc. and Sanrio, Inc.,

CASE NUMBER

CV12-07347-DDP(JCx)

PLAINTIFF(S)

v.

Jason Lancaster, an individual and d/b/a  
 www.partyanimalsoc.com; The Party Animals, LLC;  
 and Does 1 – 10, inclusive,

DEFENDANT(S).

## SUMMONS

TO: DEFENDANT(S): Jason Lancaster, an individual and d/b/a www.partyanimalsoc.com;  
 The Party Animals, LLC

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, J. Andrew Coombs, whose address is J. Andrew Coombs, A P.C., 517 East Wilson Avenue, Suite 202, Glendale, CA 91206. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: AUG 27 2012By: ANDRES PEDRO

Deputy Clerk

(Seal of the Court)  
1202

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA**  
**CIVIL COVER SHEET**

O P

<b>I (a) PLAINTIFFS</b> (Check box if you are representing yourself <input type="checkbox"/> ) Disney Enterprises, Inc., DC Comics and Sanrio, Inc.		<b>DEFENDANTS</b> Jason Lancaster, an individual and d/b/a www.partyanimalsoc.com [See Attachment]	
<b>(b) County of Residence of First Listed Plaintiff</b> (Except in U.S. Plaintiff Cases): Los Angeles		<b>County of Residence of First Listed Defendant</b> (In U.S. Plaintiff Cases Only):	
<b>(c) Attorneys</b> (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) J. Andrew Coombs (SBN 123881). J. Andrew Coombs, A Professional Corporation 517 E. Wilson Ave., Suite 202, Glendale, California 91206 Telephone: (818) 291-6444 / Facsimile: (818) 500-3201		<b>Attorneys</b> (If Known)	

<b>II. BASIS OF JURISDICTION</b> (Place an X in one box only.)  <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)  <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only</b> (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:33%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:47%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td align="center"><input type="checkbox"/> 1</td> <td align="center"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td align="center"><input type="checkbox"/> 4</td> <td align="center"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td align="center"><input type="checkbox"/> 2</td> <td align="center"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td align="center"><input type="checkbox"/> 5</td> <td align="center"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td align="center"><input type="checkbox"/> 3</td> <td align="center"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td align="center"><input type="checkbox"/> 6</td> <td align="center"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

**IV. ORIGIN** (Place an X in one box only.)

☒ 1 Original Proceeding    
 ☐ 2 Removed from State Court    
 ☐ 3 Remanded from Appellate Court    
 ☐ 4 Reinstated or Reopened    
 ☐ 5 Transferred from another district (specify): \_\_\_\_\_    
 ☐ 6 Multi-District Litigation    
 ☐ 7 Appeal to District Judge from Magistrate Judge

**V. REQUESTED IN COMPLAINT: JURY DEMAND:** ☒ Yes    ☐ No (Check 'Yes' only if demanded in complaint.)

**CLASS ACTION** under F.R.C.P. 23: ☐ Yes    ☒ No                      **MONEY DEMANDED IN COMPLAINT:** \$ \_\_\_\_\_

**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)  
 Copyright Infringement 17 U.S.C. §§ 101 et seq.

**VII. NATURE OF SUIT** (Place an X in one box only.)

<b>OTHER STATUTES</b> <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities /Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<b>CONTRACT</b> <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>TORTS</b> <b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<b>TORTS</b> <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <b>FORFEITURE/PENALTY</b> <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>PROPERTY RIGHTS</b> <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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**VIII(a). IDENTICAL CASES:** Has this action been previously filed and dismissed, remanded or closed? ☒ No    ☐ Yes

If yes, list case number(s):

**FOR OFFICE USE ONLY:** Case Number: CV12-07347-DDP(JC)

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

VIII(b). RELATED CASES: Have any cases been previously filed that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): \_\_\_\_\_

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or  
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or  
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or  
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: List the California County, or State if other than California, in which EACH named plaintiff resides (Use an additional sheet if necessary)

☐ Check here if the U.S. government, its agencies or employees is a named plaintiff.

Los Angeles County - Disney Enterprises, Inc., DC Comics

San Mateo County - Sanrio, Inc.

List the California County, or State if other than California, in which EACH named defendant resides. (Use an additional sheet if necessary).

☐ Check here if the U.S. government, its agencies or employees is a named defendant.

Los Angeles (All Defendants)

List the California County, or State if other than California, in which EACH claim arose. (Use an additional sheet if necessary)

Note: In land condemnation cases, use the location of the tract of land involved.

Los Angeles

X. SIGNATURE OF ATTORNEY (OR PRO PER): \_\_\_\_\_

Date 8/24/12

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

**Civil Cover Sheet Attachment**

Disney Enterprises, Inc., DC Comics and Sanrio, Inc.,

Plaintiffs,

v.

Jason Lancaster, an individual and d/b/a [www.partyanimalsoc.com](http://www.partyanimalsoc.com); The Party  
Animals, LLC; and Does 1 – 10, inclusive,

Defendants.